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*Attorneys for Defendant Meta Platforms, Inc.
(formerly known as Facebook, Inc.)*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER PRI-
VACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF YACINE BRAHIMI
REGARDING META'S NOTICE OF
SETTLEMENT**

1 I, Yacine Brahimi, hereby declare as follows:

2 1. I am a software engineer at Meta Platforms, Inc. (formerly known as Facebook, Inc.). I
3 submit this declaration to describe the in-app notice Meta issued in connection with the settlement of
4 the consolidated action *In re: Facebook, Inc. Consumer Privacy User Profile Litigation*, Case No. 3:18-
5 md-02843-VC (the “Settlement”). I make this declaration based on my own knowledge, and I would
6 testify to the matters stated herein under oath if called upon to do so.

7
8 2. I was the engineer primarily responsible for implementing the in-app notice of the Set-
9 tlement. On April 12, 2023, Meta began providing notice by “jewel” notification on Facebook to cur-
10 rent Facebook accounts of users predicted to have been United States users from May 24, 2007, through
11 December 22, 2022, inclusive. An example of this notice is attached as Exhibit E to the Class Action
12 Settlement Agreement and Release (Dkt. 1096-2).

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14 3. Meta issued these notices through Facebook between April 12, 2023 and May 11, 2023.
15 The notices were sent in three phases to avoid overloading the Settlement website:

- 16 a. Phase 1: The first phase ran from April 12, 2023 through April 16, 2023. Meta
17 issued approximately 1.8 million notices per day during this phase.
18 b. Phase 2: The second phase ran from April 21, 2023 through May 2, 2023. Meta
19 issued approximately 20.8 million notices per day during this phase.
20 c. Phase 3: The third and final phase ran from May 3, 2023 through May 11, 2023.
21 Meta issued approximately 50 million notices per day during this phase.

22
23 4. In total, Meta sent 699 million notices. Meta was able to confirm that of these notices,
24 685 million notices were successfully delivered, which reflects a 97.9% success rate. Meta was unable
25 to confirm whether the remaining 14 million notices were successfully delivered even after attempting
26 to send those notices a second time. It is not possible to confirm delivery of these notices due to
27
28

1 potential software bugs, data inaccuracies and data logging inconsistencies, which is to be expected
2 when issuing in-app notices of this volume.

3 5. As of June 27, 2023, 164.7 million Facebook users had viewed the notification and 29.5
4 million Facebook users had clicked through the notice flow to the Settlement website.
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7 I declare under penalty of perjury under the laws of the United States of America that the fore-
8 going is true and correct.

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10 Executed on July 10th, 2023 in Seattle, Washington.

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14 Yacine Brahim
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